

EXHIBIT 2

FILED
GARFIELD COUNTY, OKLA.

JUN 22 2016

IN THE DISTRICT COURT OF GARFIELD COUNTY
STATE OF OKLAHOMA

CHANELLE SATTERFIELD,

Plaintiff,

vs.

KAILEE TAYLOR,

Defendant.

MARGARET E. JONES
COURT CLERK
DEPUTY COURT CLERK

CJ-2016-

140-01

Attorney Lien Claimed

PETITION

COMES NOW, the Plaintiff, Chanelle Satterfield, by and through her attorneys Randy Wagner and Jennifer Liggett and would specifically allege the following in support of PETITION:

1. That the Plaintiff Chanelle Satterfield, hereinafter referred to as "Satterfield", is a resident of Warren County, State of Virginia.
2. That the Defendant, Kailee Taylor, hereinafter referred to as "Taylor", is a resident of Garfield County, State of Oklahoma.
3. That this cause of action arises out of a automobile collision that occurred in Garfield County, State of Oklahoma on July 24th, 2014.

COUNT I- NEGLIGENCE

That paragraphs 1 through 3 are hereby incorporated by reference.

4. That on or about July 24th, 2014, Satterfield was a passenger in an automobile that was rear - ended by another automobile driven by Taylor.
5. That Taylor was negligent for not paying attention to the roadway, maintaining an unsafe speed and distance from the vehicle in front of her.
6. Taylor's negligence is the direct cause for personal injuries sustained by Satterfield. Satterfield has incurred medical expenses, lost wages, and other out-of-pocket expenses, as a result of the negligence of Taylor.
7. That Satterfield has sustained pain and suffering, loss of consortium, permanent injury, and other damages, as a result of the negligence of Taylor.

8. That upon reason and belief, Taylor was operating a cellular, telephone device at the time of the collision.

9. That operating a cellular telephone, while operating a motor vehicle, constitutes reckless disregard on the part of Taylor towards the general public.

WHEREFORE PREMISES CONSIDERED, Satterfield demands judgment, against Taylor for actual and punitive damages, in an amount in excess of the amount required for diversity jurisdiction, pursuant to Section 1332 of Title 28 of the United States Code, exclusive of interest, attorney fees, and costs.

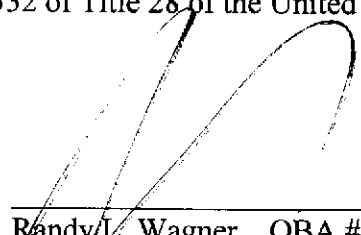
COUNT II - NEGLIGENCE PER SE

That paragraphs 1 through 9 are hereby incorporated by reference.

10. That Taylor was following too closely to the vehicle in front of her in violation of Title 47 O.S. § 11-310(a). Furthermore, Taylor was not paying full time and attention to the roadway in violation fo Title 47 O.S. § 11-901 (b). Additionally, Taylor was operating a cellular telephone device, while driving, in violation of Title 47 § 11-901.

11. That proof of said violation of said statute and/or statutes constitute negligence per se against Taylor, without further proof.

WHEREFORE PREMISES CONSIDERED, Satterfield demands judgment against Taylor, for actual and punitive damages, in an amount in excess of the amount required for diversity jurisdiction, pursuant to Section 1332 of Title 28 of the United States Code, exclusive of interest, attorney fees and costs.



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VERIFICATION

Commonwealth of Virginia
~~State of Oklahoma, County of Garfield, ss:~~

Chanelle Satterfield, of lawful age and being first duly sworn upon oath, states: I am Chanelle Satterfield, Plaintiff above named. I have read the foregoing instrument and state that all statements contained therein are true and correct according to my best information and belief.

Chanelle Satterfield
Chanelle Satterfield, Plaintiff

Subscribed and sworn to before me on June 16, 2016, by Chanelle Satterfield, Plaintiff above named.

My Commission Expires:

10.31.19
Comm. # 173690

Jill T. Johns
Notary Public

